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6
UNITED STATES DISTRICT COURT

7
DISTRICT OF NEVADA

8
 9 ZACHARY WHITE,

10 Plaintiff,

11 vs.

12 WAL-MART STORES, INC., a foreign
 corporation; SAM'S WEST, INC. d/b/a
 13 "SAM'S CLUB #4983," a foreign corporation;
 DOES I-X and ROE ENTITIES I-X, inclusive,

14
 15 Defendants.

CASE NO. Case No. 2:20-cv-00155-GMN-EJY

**STIPULATION AND [PROPOSED] ORDER
 TO EXTEND DEADLINE FOR PLAINTIFF
 TO RESPOND TO DEFENDANT'S
 PARTIAL MOTION TO DISMISS
 PLAINTIFF'S COMPLAINT
 (Third Request)**

16 Plaintiff Zachary White ("Plaintiff") and Defendant Sam's West, Inc. d/b/a Sam's Club
 17 #4983 ("Defendant") (collectively, the "Parties"), stipulate and agree as follows, under LR IA 6-
 18 1, LR IA 6-2, and LR 7-1:

19 1. On March 10, 2020, Defendant filed a Partial Motion to Dismiss Plaintiff's
 20 Complaint (the "Motion").

21 2. The Court Clerk has calendared the deadline for Plaintiff to respond to Defendant's
 22 Motion as March 24, 2020.

23 3. On March 31, 2020, an Order approving Stipulation and [Proposed] Order to
 24 Extend Deadline for Plaintiff to Respond to Defendant's Partial Motion to Dismiss Plaintiff's
 25 Complaint (First Request) was entered. The deadline for Plaintiff to respond to the Motion was
 26 extended to April 14, 2020.

27 4. On April 10, 2020, an Order approving Stipulation and [Proposed] Order to Extend
 28 Deadline for Plaintiff to Respond to Defendant's Partial Motion to Dismiss Plaintiff's Complaint

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1 (Second Request) was entered. The deadline for Plaintiff to respond to the Motion was extended
2 to May 5, 2020.

3 5. The Parties agree to extend the deadline for Plaintiff to respond to the Motion by
4 two (2) weeks to May 19, 2020. Defendant shall have two (2) weeks thereafter to file its Reply.

5 6. Counsel for Plaintiff has requested the extension to provide ample time to prepare
6 a response to Defendant's Motion due to the disruption of the office and personnel of counsel for
7 Plaintiff due to the Covid-19 virus, and counsel for Defendant has agreed to the extension.

8 7. In addition, the Parties are discussing the potential for resolution of this case.

9 8. This is the third stipulation for an extension of time for Plaintiff to respond to
10 Defendant's Motion, and the Stipulation is not made for purposes of delay.

11 | Dated: May 4, 2020

Dated: May 4, 2020

12 | Respectfully submitted,

Respectfully submitted,

13 LARSON ZIRZOW KAPLAN &
COTTNER

LITTLER MENDELSON, P.C.

/s/ Kory L. Kaplan

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Attorneys for Defendant
SAM'S WEST, INC.

IT IS SO ORDERED.

Dated this 5 day of May, 2020.

Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT